

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

SEALED PLAINTIFF 1)	
)	
and)	
)	
SEALED PLAINTIFF 2,)	
)	
)	
Plaintiffs,)	
)	
v.)	Civil Action No. 3:22-cv-00670-MHL
)	
PATRIOT FRONT, <i>et al.</i>,)	
)	
)	
Defendants.)	

**PLAINTIFFS' RESPONSE TO NOTICE OF
THE CLERK'S INTENTION TO PROCEED WITH ABATEMENT AND
MOTION FOR LEAVE TO TAKE LIMITED DISCOVERY**

Plaintiffs, by counsel, respectfully submit this response to the Notice of the Clerk's Intention to Proceed with Abatement (ECF No. 91). For the reasons outlined in the attached memorandum, Plaintiffs request that the Court find good cause shown for the delay in service of process on Jacob Brown and extend the deadline for service. To help effectuate such service, Plaintiffs further request that the Court grant Plaintiffs leave to take limited discovery of Brown's responding co-Defendants for the sole purpose of identifying Brown's contact information and location.

Date: June 22, 2023

Respectfully submitted,

SEALED PLAINTIFFS 1 and 2

By: /s/ Michael R. Shebelskie

Michael R. Shebelskie
VSB No. 27459
Kevin S. Elliker
VSB No. 87498
HUNTON ANDREWS KURTH LLP
Riverfront Plaza, East Tower
951 East Byrd Street
Richmond, VA 23219-4074
Telephone: (804) 788-8200
Facsimile: (804) 788-8218
mshebelskie@HuntonAK.com
kelliker@HuntonAK.com

New York, NY 10019-6064
Telephone: (212) 373-3000
Facsimile: (212) 492-0441
dkramer@paulweiss.com
jhill@paulweiss.com
glaufer@paulweiss.com
roloughlin@paulweiss.com

Counsel for Plaintiffs

Edward G. Caspar (admitted pro hac vice)
DC Bar No. 1644168
Arthur Ago (admitted pro hac vice)
DC Bar No. 463681
LAWYERS' COMMITTEE FOR CIVIL
RIGHTS UNDER LAW
1500 K Street, NW, Suite 900
Washington, DC 20005
Telephone: (202) 662-8600
Facsimile: (202) 783-0857
ecaspar@lawyerscommittee.org
aago@lawyerscommittee.org

Ryan P. Phair (admitted pro hac vice)
DC Bar No. 479050
HUNTON ANDREWS KURTH LLP
2200 Pennsylvania Ave, NW Suite 900
Washington, DC 20037-1701
Telephone: (202) 955-1500
Facsimile: (202) 778-2201
rphair@HuntonAK.com

Daniel J. Kramer (admitted pro hac vice)
NY Bar No. 1979392
Joshua Hill (admitted pro hac vice)
NY Bar No. 4297826
Gregory F. Laufer (admitted pro hac vice)
NY Bar No. 4614764
Robert J. O'Loughlin (admitted pro hac vice)
NY Bar No. 5225966
PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP
1285 Avenue of the Americas

CERTIFICATE OF SERVICE

I certify that on June 22, 2023, I caused a copy of the foregoing to be electronically filed using the CM/ECF system, which will send notification to counsel of record of such filing by operation of the Court's electronic system. Parties may access this filing via the Court's electronic system. Additionally, copies have been sent to the following via Email:

Bradley P. Marrs (VSB#25281)
Marrs & Henry
7202 Glen Forest Drive, Suite 307
Richmond, VA 23226
Tel. (804) 662-5716
Fax (804) 662-5712
bmarrs@marrs-henry.com

Glen K. Allen
Glen Allen Law (MD-NA)
5423 Springlake Way
Baltimore, MD 21212
Tel: (410) 802-6453
Glenallenlaw@protonmail.com

/s/ Michael R. Shebelskie

Michael R. Shebelskie
VSB No. 27459
HUNTON ANDREWS KURTH LLP
Riverfront Plaza, East Tower
951 East Byrd Street
Richmond, VA 23219-4074
Telephone: (804) 788-8200
Facsimile: (804) 788-8218
mshebelskie@HuntonAK.com

Counsel for Plaintiffs